

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN’S MOTION *IN LIMINE* TO  
PRECLUDE THE GOVERNMENT FROM ARGUING THAT  
TURKEY FUNDED FIG’S WORK FOR INOVO**

Defendant Rafiekian, through counsel, hereby respectfully requests that this court preclude the government from (1) claiming in its opening statement that evidence exists that the government of Turkey “funded” Flynn Intel Group, Inc.’s work for Inovo BV, and (2) arguing in its closing that the government of Turkey “funded” this work. Alternatively, the Court should require the government to (a) file a bill of particulars explaining the basis for its claim that the government of Turkey funded the work and (b) identify with specificity the documents in its production that support this claim. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached to this motion.

Defendant respectfully requests that the Court hear this motion on June 18, 2019, at 9:00 a.m., or at such time as the Court may direct.

Dated: May 28, 2019

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 28th day of May 2019, true and genuine copies of Defendant Rafiekian's Motion *In Limine* to Preclude the Government from Arguing that Turkey Funded FIG's Work for Inovo were sent via electronic mail by the Court's CM/ECF system to the following:

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/s/  
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